



02-REN-1038

DOCKET

03-RPS-1078

DATE June 14 2011

RECD. June 14 2011

**Pacific Power
Rocky Mountain Power**
1407 W North Temple
Salt Lake City, UT 84116

Please Reply To:

Jordan A. White, Senior Counsel
Suite 320
Direct Dial (801) 220-2279
Fax (801) 220-74416
Email: jordan.white@pacificorp.com

June 14, 2011

California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5504

Via Email:
Docket@energy.state.ca.us

Re: Dockets No. 03-RPS-1078 and 02-REN-1038P: Comments of PacifiCorp Regarding the Draft 2007 RPS Verification Report.

Dear Presiding Member Peterman and Associate Member Boyd:

PacifiCorp, d.b.a. Pacific Power (PacifiCorp or the Company), has resolved an outstanding issue that is addressed in the Draft RPS 2007 Verification Report. At pages 28-29, the draft report describes a question concerning the Western Renewable Energy Generation Information System ("WREGIS") Certificates associated with procurement from a project that receives renewable fuel from Hill Air Force Base ("Hill AFB"). PacifiCorp is pleased to report that on June 10, 2011, Hill AFB provided PacifiCorp with a letter stating its agreement that all renewable credits associated with the fuel are PacifiCorp's.

The Hill AFB letter is enclosed as Attachment A. That letter concludes that, "Hill Air Force Base disclaims ownership of, and is not selling, and will not be reporting, renewable energy certificates, Green Attributes, WREGIS Certificates, or non-energy attributes of any electric generation from the Project, related to the PPA or otherwise."

In light of this resolution, PacifiCorp asks that the procurement volumes associated with Hill AFB be included in PacifiCorp's RPS procurement for California for all years as contracted. PacifiCorp will continue to work with the Commission staff in appropriately updating the procurement volumes related to Hill AFB.

PacifiCorp thanks the Commission for its attention to this matter. Should there be any questions concerning these comments, please do not hesitate to contact me.

Respectfully submitted,

Jordan White
Senior Counsel
PacifiCorp
1407 West North Temple, Suite 320
Salt Lake City, UT 84116
Tel: (801) 220-2279
Fax: (801) 220-4615
Email: Jordan.white@pacificorp.com



Andrew Brown
Ellison, Schneider & Harris L.L.P.
2600 Capitol Avenue, Suite 400
Sacramento, CA 95816
Tel: (916) 447-2166
Fax: (916) 447-3512
Email: abb@eslawfirm.com

Attorneys for PacifiCorp

cc:

Kate Zocchetti (email)
Gina Barkalow (email)
Theresa Daniels (email)
CEC Dockets (Hand Delivery)

Attachment: Letter from Hill AFB

Jordan White
Senior Counsel
PacifiCorp
1407 West North Temple, Suite 320
Salt Lake City, UT 84116
Tel: (801) 220-2279
Fax: (801) 220-4615
Email: Jordan.white@pacificorp.com



Andrew Brown
Ellison, Schneider & Harris L.L.P.
2600 Capitol Avenue, Suite 400
Sacramento, CA 95816
Tel: (916) 447-2166
Fax: (916) 447-3512
Email: abb@eslawfirm.com

Attorneys for PacifiCorp

ATTACHMENT A
LETTER FROM HILL AIR FORCE BASE



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS AIR FORCE LEGAL OPERATIONS AGENCY (HQ AFLOA)

June 10, 2011

PacifiCorp
825 N.E. Multnomah
Portland, OR 97232
Attention: Bruce Griswold

Re: Power Purchase Agreement between Hill Air Force Base and PacifiCorp dated January 10, 2005 ("PPA")/Renewable Energy Requirement Guidance for EPACT 2005 and Executive Order 13423 Final dated January 28, 2008 ("Guidance")

Ladies and Gentlemen:

Reference is made to the above-referenced PPA and the Guidance. PacifiCorp purchases energy under the PPA from the Hill Air Force Base landfill gas generator ("Project"). Hill Air Force Base reports under the Guidance information concerning landfill natural gas that it provides to the Project. The Project burns the landfill natural gas to serve PacifiCorp under the PPA. Hill Air Force Base makes no use of any energy from the Project, except as your customer under a tariff purchasing retail energy that may be generated by the Project. As of the date hereof, Hill Air Force Base has no contract with the Project or any other person or entity concerning renewable energy credits from the landfill natural gas.

Pursuant to Section 3.3.3 of the Guidance, "agencies may not count renewable energy or REC purchases from resources that are included in the utility's normal generation mix. Agencies may not count renewable energy or REC purchases that have been paid for by captive utility ratepayers unless the revenue or further sale of the renewable energy or RECs is returned to those ratepayers or used for renewable resource development."

Accordingly, this will confirm that Hill Air Force Base disclaims ownership of, and is not selling, and will not be reporting, renewable energy certificates, Green Attributes, WREGIS Certificates, or non-energy attributes of any electric generation from the Project, related to the PPA or otherwise.

Please contact me at karen.white@tyndall.af.mil if you have any questions.

Yours truly,

A handwritten signature in black ink, reading "Karen S. White", is written over the typed name.

KAREN S. WHITE, GS-14, DAF
Staff Attorney